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1 A. I see that on the screen.

2 Q. Okay. And so is this email -- this is Ms. Sells asking  
3 Leigha to provide her video footage that she has of -- some  
4 sort of video footage that she has taken at the college;  
5 correct?

6 A. That's my understanding. I did not send that email. I  
7 was just copied on it, but yes, to my understanding.

8 Q. All right. And did you ever see any of the video footage  
9 she was talking about?

10 A. I don't recall that.

11 Q. Did you review any of -- there are two complaints filed  
12 against Leigha by two students. Did you review any of those  
13 complaints?

14 A. Again, I wasn't involved in the investigation.

15 Q. Okay. I mean, you did sit in on the meeting about the  
16 investigation, though; correct?

17 A. I sat in on the final meeting where Leigha was present.

18 Q. Okay.

19 MS. STALLWORTH: David, are we at a good time to  
20 take a break?

21 MR. ASHLEY: This is actually a perfect spot.

22 (Off record, 4:09 p.m. to 4:15 p.m.)

23 Q. (By Mr. Ashley) Dr. Strong, you're the Dean over the  
24 Personal Services, which includes the cosmetology program. Do  
25 you -- do you have an understanding how the classroom

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1 assignments work and how the classroom runs?

2 A. I have an understanding, yes.

3 Q. And do students -- do they do group work?

4 A. They do.

5 Q. Okay. But are the students -- are their assignments  
6 graded individually?

7 A. Yes. They have individual and group work.

8 Q. Are their group work assignments graded?

9 A. I don't know that. I don't know how the grading format  
10 works.

11 Q. Okay. And is this something that -- I mean, the students  
12 from the cosmetology program, from the time they enter the  
13 program to the time they leave, are they doing group -- does  
14 some of the class involve group assignments, group work?

15 A. Depending on the class, on and off, yes.

16 Q. Okay. During the spring 2025 semester, were students in  
17 these cosmetology classes, were they doing group work?

18 A. I'm not aware of that.

19 Q. You don't know one way or the other?

20 A. I do not know if it was specifically in the spring with  
21 group work.

22 Q. Do you know which classes required they do group work?

23 A. I do not know that either.

24 Q. So do you have any understanding about -- is there a  
25 weekly assignment that the students do?

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1 A. There's not a weekly assignment. They have weekly  
2 assignments in general throughout all of their classes.

3 Q. Okay. And then are they graded on those assignments each  
4 week?

5 A. Yes.

6 Q. But each student does their own assignment; right?

7 A. Correct.

8 Q. Do you know if Leigha is completing these assignments?

9 A. I do not know that.

10 Q. Do you -- does the school -- I mean, are the students --  
11 are they -- in order for their -- for them to get through  
12 their assignments, do they have to work in a pair?

13 A. They are encouraged to work in pairs.

14 Q. Is there a way for them to do their assignments without  
15 working in a pair?

16 A. We can offer alternatives, such as mannequin work or  
17 potentially doing the work on themselves.

18 Q. Okay. So there is a way to do these assignments  
19 individually; correct?

20 A. Yes.

21 Q. Do you know, do these classes -- do they always have an  
22 even number of students?

23 A. Well, the class is set at 20 students. That's the cap,  
24 but that -- I mean, day-to-day, that doesn't take into account  
25 if somebody is absent or three people are absent, for example.

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1 Q. I gotcha. So some days there's going to be an odd number  
2 of students; right?

3 A. Yes.

4 Q. And so does that mean that on those days, students are  
5 either going to work individually, or instead of being two to  
6 a group, there's going to be three to a group?

7 A. Either way. And we have worked with both ways.

8 Q. Okay. And, I mean, are partner -- when these students  
9 partner up, are partners assigned? How does that work?

10 A. No. They are not assigned.

11 Q. Okay. You know, there are just sometimes where, whether  
12 because it's an odd number or whatever, students just end up  
13 without a partner?

14 A. Depending on, you know, the students that are in the  
15 class, they might end up with an odd number. And like we said  
16 a second ago, they could either work in a group of three or  
17 they could work on a mannequin. There are different options.

18 Q. So, I mean, what if -- I mean, what happens if, you know,  
19 students in the class decide that they don't want to work with  
20 another student, what options are there, then?

21 A. Just, like we said in the beginning, they could opt to  
22 work on a mannequin, or if it's suitable, they could perform  
23 the work on themselves. So if they were doing a manicure or a  
24 pedicure, they could do it on themselves.

25 Q. Okay. So it's possible if, for whatever reason, the

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1 student, you know, can't work with a partner, they can still  
2 do the work and complete the assignments; right?

3 A. Yes.

4 Q. Do you know, did Leigha have as an instructor in the  
5 spring semester -- did she have Jada Strickland as an  
6 instructor?

7 A. I don't know that for sure.

8 Q. Okay. Do you know if she has Jada Strickland as an  
9 instructor this semester?

10 A. Yes, she does.

11 Q. Okay. Jada Strickland, have you talked to her about  
12 issues with Leigha in the classroom this semester?

13 A. Can you repeat the question?

14 Q. Have you and Jada Strickland talked about issues with  
15 Leigha in the classroom this present semester?

16 A. Other than Leigha saying some days she doesn't have a  
17 partner, no.

18 Q. Okay. And what did y'all talk about regarding that?

19 A. From my understanding, Leigha approached Jada and said  
20 she doesn't have a partner for some of the group work. So we  
21 offered what we just discussed a few minutes ago, options to  
22 work in a group of three if people wanted to do that, on a  
23 mannequin, or she could also work on herself.

24 Q. Okay. And that's an alternative that she can do to  
25 complete the assignments?

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1 A. Yes.

2 Q. I mean, Jada, she wasn't like, okay, well, I'm going to  
3 help you find a partner or anything like that?

4 A. No. The instructors try their hardest to make sure  
5 everyone is paired up, but we don't force students into  
6 groups. So if there was an odd number, or Leigha is by  
7 herself, they -- we can't force students.

8 Q. And if she is okay being by herself, then is that okay?

9 A. She can complete the program that way, like I said, with  
10 the accommodation. So with the mannequin or completing it by  
11 herself or if it's in a group of three.

12 Q. Okay. And so her just doing the assignment on her own,  
13 that wouldn't be a reason to remove her from the college, is  
14 it?

15 MS. STALLWORTH: Objection. You can answer.

16 THE WITNESS: No.

17 Q. (By Mr. Ashley) Are you aware of any concerns students  
18 have expressed about working with Leigha in the classroom?

19 A. I believe it was Jada -- which is what I just said a few  
20 minutes ago -- had said sometimes Leigha doesn't have a  
21 partner. So that's when I told her, you know, for these other  
22 accommodations; mannequin work, working on her own hands or  
23 feet.

24 Q. And did she say why she doesn't have a partner?

25 A. I do not recall.

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1 Q. You don't recall if she said it, or you just don't recall  
2 what she said?

3 A. I don't recall if she said it.

4 Q. Okay. I mean, have you heard any issues that students  
5 don't want to work with Leigha because they are concerned over  
6 a lawsuit?

7 A. Not to my knowledge. I'm not in the classroom, so I  
8 wouldn't hear that.

9 MR. ASHLEY: Okay. I'm almost done here, if you  
10 give me a minute. I think I can finish up here. Just  
11 give me one minute. This will be Exhibit 19.

12 (Exhibit 19, Memo, 5/27/25, marked for  
13 identification)

14 Q. (By Mr. Ashley) Dr. Strong, I have got what is -- this  
15 was filed with the court yesterday afternoon. This is -- it  
16 was an exhibit to one of the college's briefs. I believe  
17 its -- the entry number is 2705. This is an email from you to  
18 Chandra Stallworth, Dr. Batten, Mr. Boykin, and I guess you're  
19 copied on it again as well. It's HGTC Update, and it says,  
20 "Good afternoon, Chandra. This morning prior to the start of  
21 class, I met with Audrey" -- and the date of this is May 27th.  
22 It says, "This morning prior to the start of class I with  
23 Audrey and Jada to discuss the implementation of the partner  
24 work protocol previously addressed last week." What are you  
25 referring to there?

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1 A. That is referring to when the partner work started for  
2 the summer semester.

3 Q. Okay. What is the protocol?

4 A. Like I said earlier, we encourage our students to work in  
5 pairs. That's the protocol.

6 Q. And so is the meeting specifically about Leigha?

7 A. The meeting was to discuss how we would handle if a  
8 student is a solo, for example, and didn't have a partner, how  
9 we would move forward.

10 Q. Okay. And what did y'all decide?

11 A. We decided on the mannequin work, which we have  
12 previously discussed, as well as working on yourself. Like I  
13 said, if you're doing a manicure or a pedicure, you can  
14 perform it on yourself.

15 Q. Okay. And we discussed, you said that the students can  
16 complete the program doing it that way; correct?

17 A. Correct.

18 Q. Okay. On this bullet point, it says "Partner work." It  
19 says, "As we have previously discussed, and in addition to the  
20 no contact orders in place between several students in the  
21 classroom, Leigha tends to invite confrontation with other  
22 students, such as drawing distinctions between herself and  
23 other students, which tends to belittle or unduly put other  
24 students down."

25 And then you go on to say, "While we understand that



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1 banter between students is a normal part of the learning  
2 environment, threats of lawsuits against students concerning  
3 different things tend to make students reluctant to  
4 meaningfully engage with Leigha." What lawsuits, threat of  
5 lawsuits, are you referring to?

6 A. There was one instance where the cosmetology group went  
7 to our other campus at Grand Strand to the aesthetics clinic,  
8 and they performed facials and things like that on each other.  
9 Again, I don't have all of the specifics for this, but there  
10 was a conversation that occurred between Leigha and an  
11 aesthetic student -- I believe this was from late spring --  
12 that Leigha, from what I was told, was discussing her current  
13 lawsuits, which made the other student uncomfortable.

14 Q. Okay. She was discussing her current lawsuit, and that  
15 made the student uncomfortable?

16 A. From my understanding, yes.

17 Q. Okay. Do you know the name of the student?

18 A. I do not.

19 Q. Is this the situation with any other students?

20 A. I don't have that information. Jada and Audrey would  
21 have that information, not me specifically.

22 Q. Okay. But are you aware of any other students  
23 complaining about Leigha or talking -- who have a complaint  
24 with regard to Leigha relating to her lawsuit?

25 A. I only have specific knowledge to the one I just

1 explained.

2 Q. Okay. And then it says, "To maintain mutual ground, I  
3 have guided Jada and Audrey to conduct business as usual  
4 within the classroom until further notice regarding the pair  
5 work. This means that starting today, May 27, 2025, they are  
6 to instruct students to work in pairs for the day to conduct  
7 manicures and eventually pedicures on each other as part of  
8 the curriculum. Students that refuse to work with Leigha are  
9 not to be disciplined in any way, will gain approval when  
10 asked if they can work in a group of three, and Leigha will  
11 ultimately end up without a partner." What are you talking  
12 about there?

13 A. That is simply discussing if Leigha ends up -- like I  
14 said, as an individual, a solo without a partner, that we  
15 would not and have not ever forced students to work together  
16 when they either say they don't want to -- and that goes for  
17 anybody -- or there is an uneven -- there is an odd number of  
18 students.

19 Q. Okay. And as we just discussed, even if that happens,  
20 the student can just work on their own and complete -- do the  
21 assignments on their own and still proceed through the program  
22 and complete it?

23 A. Correct.

24 Q. Okay. Does Leigha -- does she perform services in the  
25 clinic on clients?

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1 A. She can and she does.

2 Q. Okay. This says, "Academic performance and grading  
3 impact. Leigha is currently in three classes this summer.  
4 Each course includes both individual and group pair  
5 assignments and contributes to the final grade. Failure to  
6 complete the required pair group assignments will result in  
7 Leigha not passing the courses." Isn't that the exact  
8 opposite of what we have just been talking about?

9 MS. STALLWORTH: Objection.

10 THE WITNESS: Leigha will not fail courses for  
11 working individually or on a mannequin or in a group of  
12 three.

13 Q. (By Mr. Ashley) Well, is that what this says?

14 A. Yes, but I believe there was a conversation that took  
15 place after this email was sent, and that's where it was  
16 ultimately decided, again, we can't force students to do  
17 anything like this. We can't force you to be in a group or a  
18 pair or whatever. So, to accommodate all of our students, we  
19 offered all of those options to ensure the best path to  
20 success for all of them.

21 Q. Okay. And then that last sentence says "Any failed  
22 courses must be retaken in a future semester where the same  
23 instructional expectations will apply." Correct?

24 A. Correct.

25 Q. But you're telling me that that's no longer the case?

1 A. A failed course on its own would have to be retaken, but  
2 a student would not fail for working individually in a group  
3 assignment. Now, that does not include individual work  
4 outside of the scope of this group and pair work. So if a  
5 student is not doing their regular weekly assignments and they  
6 fail the course, they still have to make it up.

7 Q. I gotcha. But as long as the student is doing their  
8 regular weekly assignments and they're passing those  
9 assignments, they will not fail and they will move forward;  
10 correct?

11 A. Correct.

12 Q. And, to be clear, if Leigha continues to finish her  
13 assignments and she does them on her own, it's my -- and  
14 correct me if I'm wrong, but it's my understanding that she  
15 can still pass -- as long as she passes the assignments, she  
16 would still be able to pass and continue through the program;  
17 right?

18 A. That's correct.

19 Q. Okay. And then it says, "We sincerely appreciate your  
20 time and consideration." And then it says, "Given the current  
21 real-time challenges in the classroom, we believe presenting  
22 this motion to the court is crucial for the future direction  
23 of our case." What do you mean by that?

24 MS. STALLWORTH: Objection.

25 THE WITNESS: We were concerned -- and again,